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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS PRODUCTS LIABILITY LITIGATION This Document Relates to Plaintiff Marenda McCall and Edward McCall, 2:17-cv-02446-DGC	No. MD-15-02641-PHX-DGC
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PLAINTIFF'S UNOPPOSED MOTION TO TERMINATE PARTY
AND AMEND THE COMPLAINT

Plaintiff Marenda McCall, by and through undersigned counsel, and pursuant to FRCP 25(a) and 15(a)(2) hereby move the Court to terminate Edward McCall, as Plaintiff by way of an Amended Short Form Complaint in the form attached hereto as Exhibit 1, and in support, states as follows:

1. Plaintiff Marenda McCall was implanted with a Bard IVC Filter and subsequently discovered injuries in 2017. Plaintiff retained undersigned counsel, who filed a Complaint on her behalf against the Defendants for Plaintiff's IVC Filter-related injuries.
2. This case is part of a settlement with Bard.
3. Plaintiff's spouse, Edward McCall was also named as a plaintiff in this action for damages, including loss of consortium.
4. Edward McCall unexpectedly passed away September 19, 2016.
5. Plaintiff hereby submits an Amended Short Form Complaint, attached hereto as Exhibit 1, which terminates Edward McCall as Plaintiff, along with any claims for

1 damages associated with Edward McCall.

2 6. The death certificate of Edward McCall is attached as Exhibit A to the Amended
3 Short Form Complaint.
4

5 7. Counsel for Defendants has indicated that they have no objection to this motion.

6 WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Unopposed
7 Motion to Terminate Party and Amend the Complaint and order the Clerk to file the
8 Amended Short Form Complaint, attached hereto as Exhibit 1.
9

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11 DATED: 09/21/2020

Respectfully Submitted,

12
13 /s/ Stuart L. Goldenberg
14 Stuart L. Goldenberg (*pro hac vice*)
15 Marlene J. Goldenberg (*pro hac vice*)
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